

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re:	:	Chapter 11
	:	Case No. 01-01139 (JKF)
W.R. GRACE & CO., INC., <u>et al.</u> ,	:	Jointly Administered
	:	
Debtors.	:	Related Dk. Nos.: 6930
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W.R. GRACE & CO., INC., <u>et al.</u> ,	:	
	:	
Plaintiffs,	:	
	:	Adv. Pro. No. A-01-771 (JKF)
vs.	:	
	:	
MARGARET CHAKARIAN, <u>et al.</u> ,	:	
And John Does 1-1000,	:	Hearing Date: Dec. 20, 2004 12:00 p.m. (EST)
	:	Related Dk. Nos.: 322, 333, 334, 335, 336
Defendants.	:	
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**CERTIFICATION OF COUNSEL**

The undersigned hereby certifies:

1. On November 15, 2004, the Debtors and The Scotts Company filed a Motion Of The Debtors And The Scotts Company For A Temporary Stay To Enjoin The Prosecution Of All Claims Against Scotts In The State Actions [hereinafter the "Motion"]. The Motion appears as docket entry number 322. Oral argument for the Motion was set for December 20, 2004.
2. On or about December 3, 2004, opposition to the Motion was filed by the SimmonsCooper LLC Claimants (see docket no.: 333), The Lanier Law Firm Claimants (see docket no.: 334), the Official Committee of Asbestos Personal Injury Claimants (see docket no.: 335) and by Donald and Judith Webber (see docket no.: 336).

3. On December 20, 2004 the Court heard oral argument on the Motion. Following argument the Court orally denied the Motion.
4. At the conclusion of oral argument the Court requested that counsel circulate an order effecting the December 20 ruling on the Motion.
5. On December 28, 2004, counsel circulated a proposed form of order . A copy of the proposed order is attached hereto as Exhibit A. Counsel further requested that any comments or changes to the proposed order be forwarded on or before January 4, 2005.
6. To date no party has offered objection, comments or suggested changes to the proposed order.
7. Accordingly, counsel respectfully requests that the Court enter the order attached hereto as Exhibit A at the Court's earliest convenience.

**FOX ROTHSCCHILD LLP**

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Counsel for The Lanier Law Firm Claimants  
Counsel to Donald & Judith Webber*

DATE: January 5, 2005